

1 Z. KATHRYN BRANSON, ESQ., Bar No.11540  
2 LITTLER MENDELSON, P.C.  
3 3960 Howard Hughes Parkway  
4 Suite 300  
5 Las Vegas, NV 89169-5937  
6 Telephone: 702.862.8800  
7 Fax No.: 702.862.8811  
8 Email: kbranson@littler.com

9  
10 Attorneys for Defendant  
11 AT&T MOBILITY SERVICES LLC

12  
13  
14 UNITED STATES DISTRICT COURT  
15  
16 DISTRICT OF NEVADA

17 TROY STOUDNOR,

18 Plaintiff,

19 vs.

20 AT&T MOBILITY, LLC, a foreign  
21 limited-liability company and DOES 1-50,  
22 inclusive;

23 Defendant.

24 Case No. 2:20-cv-00910-KJD-NJK

25 **STIPULATION AND [PROPOSED] ORDER  
DISMISSING ACTION PENDING  
ARBITRATION**

26  
27 WHEREAS Plaintiff Troy Stoudnor (“Plaintiff”) and Defendant AT&T Mobility Services  
28 LLC (erroneously named in the Complaint as “AT&T Mobility, LLC” and hereinafter referred to  
as “Defendant”) (collectively the “Parties”), have agreed to submit their claims to arbitration pursuant to  
an arbitration agreement between the Parties in connection with Plaintiff’s employment with  
Defendant; and

29  
30 WHEREAS the Parties have met and conferred and agree that it would be in the best interests  
31 of judicial economy and in the best interests of the Parties to move this action to arbitration and  
32 stipulate to dismissal of this action, without prejudice;

33  
34 NOW THEREFORE, the Parties, through their respective counsel hereby stipulate and  
35 respectfully request that the Court orders as follows:

1  
2       1. This matter shall hereby be dismissed, without prejudice, pending resolution of the  
3 arbitration (i.e., through settlement or arbitral decision) brought by Plaintiff against Defendant,  
4 as well as pending the resolution of all claims and counterclaims that may be asserted in response  
5 by Defendant against Plaintiff during arbitration.  
6

7       2. The Court shall retain jurisdiction as may be required prior to the issuance of the final  
8 award and resolution of all claims in arbitration for the purpose of enforcing the arbitration agreement;

9       3. The Court shall retain jurisdiction over this matter following the issuance of the  
10 final award and resolution of all claims in arbitration for the purpose of enforcing the arbitrator's  
11 final decision or award; and  
12

13       ///  
14  
15       ///  
16  
17       ///  
18  
19       ///  
20  
21       ///  
22  
23       ///  
24       ///  
25  
26       ///  
27  
28

1       4. This dismissal, without prejudice, shall not prevent either party from asserting any  
2 objection or defense, including those based on jurisdiction or venue, in the event that this action  
3 returns to Court.

4  
5 IT IS SO STIPULATED.

6       Dated: July 7, 2020

7       Respectfully submitted,

9       \_\_\_\_\_  
10      /s/ *Joseph R. Ortuno, Esq.*  
11      DANIEL R. WATKINS, ESQ.  
12      JOSEPH R. ORTUNO, ESQ.  
13      WATKINS & LETOFSKY, LLP  
14      Attorneys for Plaintiff  
15      TROY STOUDNOR

6       Dated: July 7, 2020

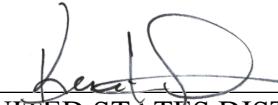
7       Respectfully submitted,

9       \_\_\_\_\_  
10      /s/ *Z. Kathryn Branson, Esq.*  
11      Z. KATHRYN BRANSON, ESQ.  
12      LITTLER MENDELSON, P.C.

13      Attorneys for Defendant  
14      AT&T MOBILITY SERVICES LLC

15      IT IS SO ORDERED.

16      Dated: \_\_\_\_\_ July 8, 2020.

17      \_\_\_\_\_  
18        
19      UNITED STATES DISTRICT COURT  
20      JUDGE